



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

MAY 20 2014

Sent via email

Mark Nations
The Doe Run Company
1221 Mill Street
Leadwood, Missouri 63601

RE: Comments on the Draft Post Removal Site Control Plan – Eastern Portion for the Bonne Terre Mine Tailings Site submitted in March 2014.

Dear Mr. Nations:

I have reviewed the Draft Post Removal Site Control Plan for the Bonne Terre Mine Tailings Site-Eastern Portion, dated March 2014. I am pleased to provide the following comments on behalf of the United States Environmental Protection Agency (EPA) and the State of Missouri.

General Comments

1. EPA/MDNR should be notified of any future inspections at the site so that attendance would be possible.
2. EPA intends to use the Bonne Terre Sand Drag Race Track (Formerly the J. Waller property) as an on-site soil repository. The current owner needs fill and he will then cap the area with asphalt. EPA is currently working on an Environmental Covenant with the owner and will distribute the map/preliminary design to Doe Run once the area has been delineated.

Specific Comments

1. Page 5, Section 2.5, Paragraph 2, Post-Construction Monitoring: "Based on the sample results that have been submitted to EPA/MDNR as part of the quarterly progress reports, Doe Run is ceasing these activities upon the approval of this PRSCP". Page 6, Removal Action Work Plan for the Eastern Portion of the Bonne Terre Mine Tailings Site, Section 3.5, Storm Water Requirements (10 CSR 20-6 .200) states that "the substantive requirements of the State of Missouri storm water program will be complied with at the Bonne Terre site as long as runoff from the site comes into contact with the tailings or chat". According to the ARAR requirements mentioned herein, Doe Run is required by state regulations to conduct storm water sampling due to the fact that mine waste was left in place and capped and water sample values frequently exceed the ambient water quality criteria and/or the Maximum Contaminant Level (MCL) for lead. Due to these reasons, EPA and the State of Missouri do not approve termination of the requirement for quarterly water quality monitoring.

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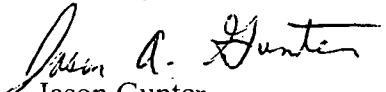
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2. Appendix C-J, Environmental Protection Declaration of Restrictive Covenants: The State of Missouri suggests changing these Declaration Restrictive Covenants to a current MOECA Environmental Covenant.
3. A portion of the eastern site is currently being used as a soil repository. This information regarding the site usage as a repository should be included in this Post Removal Site Control Plan. Please contact EPA for additional information regarding the boundaries of the current soil repository so that this area can be reflected in the updated site map.

As set forth in the Administrative Order on Consent (U.S. EPA Docket No. CERCLA-7-2000-0025), please respond to my comments within 20 working days. Please contact me if you have questions or concerns regarding my comments.

Sincerely,



Jason Gunter

US EPA Region 7
11201 Renner Blvd.
Lenexa, KS.

Cc: Brandon Wiles, MDNR
Chris Neaville, MDNR
Julie VanHorn, USEPA